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January 7, 2021

Honorable Sarah L. Cave
United States Magistrate Judge United States District Court
Southern District of New York
500 Pearl Street, Room 1670
New York, New York 10007

Re: **Curry v. P&G Auditors and Consultants et al.** (20-cv-06985)
Request for adjournment of deadline to respond to cross claims

Dear Judge Cave:

My firm represents the Plaintiffs in the above-referenced matter. We write with the consent of all parties to request an adjournment of several deadlines.

First, Plaintiffs respectfully request the Court to extend their deadline to respond to the cross-claims asserted by P&G Auditors and Consultants, LLC, GRC Solutions, LLC and PGX, LLC ("Contractor Defendants") against Plaintiffs and corporate entities formed by Plaintiffs. The current deadline to respond to the cross claims is January 11, 2021, and Plaintiffs respectfully request that the Court extend the deadline to February 10, 2021.

Next, the Contractor Defendants and Apple Bancorp, Inc. ("Apple Bank") respectfully request that the deadline to respond to Plaintiffs' motion for collective action certification pursuant to 29 U.S.C § 216(b) from January 11, 2021 to February 1, 2021, with Plaintiffs' reply due by February 15, 2021. The parties have also agreed to toll the statute of limitations for members of the putative collective for 3 weeks.

This is the first request for an extension. The reason for the request is to accommodate the parties' post-New Year schedules and because of a delay caused by end of year activities including my son's bar mitzvah.

As always, we thank the Court for its attention to this matter.

Respectfully submitted,


Julia Klein